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Attorney for Defendant  
RACHEL LEANNA ROSS

UNITED STATES DISTRICT COURT  
  
FOR THE DISTRICT OF MONTANA  
  
HELENA DIVISION

UNITED STATES OF AMERICA,	)	
	)	CASE No: CR 16-05-H-DLC
VS.	)	
	)	MOTION FOR CONTINUANCE
RACHEL LEANNA ROSS,	)	
	)	
DEFENDANT.	)	
_____	)	

Comes now under signed counsel, Timothy Williams, with consent of co-counsel for Defendant Scott Owens and Assistant United States Attorney Joseph Thaggard, and would request a continuance in this matter. In support thereof undersigned counsel would show the following:

- 1) This matter is set for a Change of Plea Hearing on July 19, 2016, at 03:00 PM in the Russell Smith Federal Courthouse located at 201 E. Broadway, Missoula, Montana before Magistrate Judge Jeremiah C. Lynch.

- 2) Undersigned counsel Timothy Williams has a Jury Trial set to begin on July 18, 2016, in the Criminal Court of Shelby County, Tennessee, located at 201 Poplar Avenue, in Memphis, Tennessee for a case pending under docket number 15-01192. The case is expected to go day to day until complete. Undersigned defense counsel expects the trial will take five days. This case was set for trial on November 30, 2015, and witnesses for both the Defendant and the Attorney General's office have been issued for this date.
- 3) Defense counsel has consulted with co-counsel for Defendant, Scott Owens, and AUSA Joseph Thaggard, in order to provide this Court with dates which are not in conflict for any attorney. Three dates on which all counsel will be available are August 2, 2016, August 17, 2016, and August 19, 2016.

Respectfully submitted,

/s/ Timothy Williams  
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## CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2016, a copy of the foregoing document has been served on the following persons by the following means:

1,2,3 CM/ECF

\_\_\_ Hand Delivery

\_\_\_ Mail

\_\_\_ Overnight Delivery Service

\_\_\_ Fax

\_\_\_ E-Mail

1. CLERK, UNITED STATES DISTRICT COURT OF MONTANA

2. Joseph Thaggard, Esq.  
Assistant U.S. Attorney  
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Helena, MT 59626  
Counsel for the United States of America

3. Scott Owens, Esq.  
54 N. Last Chance Gulch, Suite 7  
Helena, MT 59601  
Attorney for Defendant Rachel Ross

By: /s/Timothy Williams  
Timothy Williams  
Attorney for Defendant